

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
Case No. 3:22cv191

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

**N.C. DEPARTMENT OF
ADULT CORRECTION, et al.,**

Defendants.

DECLARATION OF DANIEL K. SIEGEL

1. My name is Daniel K. Siegel. I am an attorney with the ACLU of North Carolina Legal Foundation (ACLU-NC), where I am employed as the Deputy Legal Director. In that position, I supervise staff attorneys, paralegals, and law students. I represent the plaintiff in this matter.

2. ACLU-NC is a non-profit civil rights organization and law firm dedicated to protecting the civil rights and liberties of all North Carolinians. ACLU-NC does not charge clients for its services.

3. I have expertise in civil rights litigation generally and prison litigation specifically. I graduated from the University of North Carolina School of Law in 2013. Afterwards, I clerked for Justice Cheri Beasley at the Supreme Court of North Carolina and worked in private practice before joining North Carolina Prisoner Legal Services in 2017, where I exclusively represented incarcerated clients in civil litigation. I joined ACLU-NC in 2019 and have continued to work on prison cases as

well LGBTQ+ issues.

4. My co-counsel Jaclyn Maffetore is a Senior Staff Attorney with ACLU-NC. She graduated from Elon University School of Law in 2016. She then practiced voting rights law with the Southern Coalition for Social Justice for three years before joining ACLU-NC in 2019. Ms. Maffetore is the lead attorney in this case.

5. My co-counsel Michele Delgado is a Staff Attorney with ACLU-NC. She graduated from North Carolina Central University School of Law in 2016. She then worked as a public defender and the U.S. Department of Health and Human Services before joining ACLU-NC in 2021.

6. ACLU-NC has maintained a relationship with Plaintiff since before her transfer to a women's prison, and Ms. Maffetore has maintained a relationship with her since 2019. Plaintiff's counsel with ACLU-NC have maintained close contact with Plaintiff through letters, prison phone calls, family members, visitations, and regular email and phone contact since her release from prison. This included complaint and declaration review and witness preparation as well as regular updates and strategy discussions regarding her case and transmission of all major filings through legal mail.

7. ACLU-NC requests an hourly rate of \$262.50 for its attorneys, which I understand to be the maximum currently allowed by the Prison Litigation Reform Act (PLRA). I believe this rate to be reasonable given the skill and experience of Ms. Maffetore, Ms. Delgado, and myself, and that, but for the PLRA, we would likely be entitled to a significantly higher hourly market rate.

8. Attached to this declaration as Attachments 1, 2, and 3 are timesheets indicating the time spent by Ms. Maffetore, Ms. Delgado, and myself on tasks associated with this litigation. In accordance with ACLU-NC's regular practice, the time indicated on these timesheets was recorded contemporaneously with the work being done and rounded down to tenth of an hour increments.

9. In the exercise of billing judgment, Ms. Maffetore, Ms. Delgado, and I have reviewed these timesheets and removed entries that may be duplicative, vague, excessive, or otherwise not recoverable. We have also removed entries for time spent briefing Plaintiff's motion for a preliminary injunction, and time that we could identify as only relating to Plaintiff's unsuccessful claims. We are not seeking fees for time spent on administrative tasks, or by paralegals and law students. In all, we have removed approximately 1,000 hours of time billed to this case.

10. The timesheets attached here reflect time spent over a period of more than three years investigating this case; drafting the complaint; defeating Defendants' motion to dismiss; conducting extensive discovery, which included reviewing thousands of documents and taking or defending fifteen depositions, including five expert depositions; partially defeating Defendants' Rule 35 motion; routine litigation tasks including legal research, setting legal strategy, client communications, and communications with co-counsel; two rounds of summary judgment briefing; briefing *Daubert* motions to exclude Defendants' expert witnesses; preparing for and participating in an evidentiary hearing; defeating Defendants' motions to stay the Court's permanent injunction before this Court and the Fourth

Circuit; merits briefing at the Fourth Circuit; and responding to Defendants' submissions in response to this Court's permanent injunction. I believe that all these tasks were reasonably necessary for the successful prosecution of this case.

11. ACLU-NC is a non-profit with limited resources and so must be judicious in selecting cases to litigate. The time ACLU-NC attorneys spent on this case had an associated opportunity cost for the attorneys involved—especially the case's lead attorney, Jaclyn Maffetore—who had less time to investigate and litigate other civil rights matters.

12. In my experience, private law firms in North Carolina are rarely willing to devote significant resources to representing incarcerated plaintiffs seeking injunctive relief, which often require significant resources over a long period of time—including the engagement of expert witnesses—and are unlikely to produce a financial windfall. These cases almost always require the active involvement of public interest organizations such as ACLU-NC.

13. Plaintiff's counsel with ACLU-NC seek to recover for a total of 1,557.5 hours. At the current PLRA rate, ACLU-NC's lodestar is \$408,843.75.¹

14. As detailed in Attachment 4 to this declaration, Plaintiff's counsel seek to recover a total of \$4,138.94 in non-taxable expenses.

15. Given the complexity of this case, its subject matter, the degree of success achieved, and the need to incentivize competent attorneys to represent incarcerated and transgender clients who have meritorious claims, I believe the

¹ This figure includes \$5,853.75 for 22.3 hours spent preparing this petition.

amount of costs, fees, and expenses sought by Plaintiff's counsel at ACLU-NC is reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this the 21st day of July, 2025.



Daniel K. Siegel

ATTACHMENT 1 - Timesheet for Jaclyn Maffetore

fname	lname	local_date	hours	notes
Jaclyn	Maffetore	1/4/2022	0.2	email to litigation team re: factual updates from client, call agenda
Jaclyn	Maffetore	1/4/2022	0.4	litigation team call re: case opening
Jaclyn	Maffetore	1/18/2022	1	litigation team call re: case opening
Jaclyn	Maffetore	1/21/2022	0.9	legal call w/ client
Jaclyn	Maffetore	1/24/2022	0.4	conf/email to secure legal mail
Jaclyn	Maffetore	1/24/2022	0.6	reviewing expert declaration shell
Jaclyn	Maffetore	1/25/2022	1.1	litigation team call re: case opening
Jaclyn	Maffetore	1/25/2022	2.7	reviewing co-counsel edits to draft complaint, conf w/ DS re: same
Jaclyn	Maffetore	2/8/2022	0.9	litigation team call + internal conf
Jaclyn	Maffetore	2/15/2022	2	editing complaint
Jaclyn	Maffetore	2/17/2022	0.5	litigation team call re: case opening
Jaclyn	Maffetore	2/21/2022	4.9	editing complaint
Jaclyn	Maffetore	2/23/2022	1.1	litigation team call re: case opening
Jaclyn	Maffetore	2/24/2022	0.5	call w/ expert witness
Jaclyn	Maffetore	2/24/2022	0.5	reviewing/finalizing complaint edits and circulating draft to team
Jaclyn	Maffetore	3/1/2022	0.5	litigation team call
Jaclyn	Maffetore	3/3/2022	1	legal call w/ Kanautica
Jaclyn	Maffetore	3/8/2022	0.9	litigation team call re: case opening
Jaclyn	Maffetore	3/16/2022	1.2	compiling resources for draft declaration; drafting declaration
Jaclyn	Maffetore	3/17/2022	2.2	drafting client declaration
Jaclyn	Maffetore	3/18/2022	5.2	drafting client declaration
Jaclyn	Maffetore	3/22/2022	1	lit team call
Jaclyn	Maffetore	3/24/2022	1	editing declaration
Jaclyn	Maffetore	3/25/2022	0.2	email to team re: next steps in light of Ettner visitation request denial
Jaclyn	Maffetore	3/28/2022	0.7	editing declaration/prepping for legal call w/ client
Jaclyn	Maffetore	3/29/2022	0.6	litigation team call
Jaclyn	Maffetore	3/29/2022	1.3	editing complaint
Jaclyn	Maffetore	3/30/2022	0.3	emails w/ expert witness re: next steps in light of visitation denial
Jaclyn	Maffetore	4/4/2022	2.8	editing complaint
Jaclyn	Maffetore	4/5/2022	3.4	editing complaint
Jaclyn	Maffetore	4/11/2022	0.9	reviewing complaint edits
Jaclyn	Maffetore	4/12/2022	0.5	legal call w/ client Kanautica Zayre-Brown
Jaclyn	Maffetore	4/12/2022	1.1	litigation team call re: unresolved complaint issues, case opening
Jaclyn	Maffetore	4/15/2022	2.6	editing complaint
Jaclyn	Maffetore	4/19/2022	1.1	Litigation team call
Jaclyn	Maffetore	4/19/2022	1.2	reviewing/incorporating complaint edits
Jaclyn	Maffetore	4/22/2022	0.2	drafting complaint verification; emailing same to team
Jaclyn	Maffetore	4/22/2022	0.2	conf w/ DS, MD re: complaint verification
Jaclyn	Maffetore	4/22/2022	0.3	incorporating complaint edits; emailing same to team
Jaclyn	Maffetore	4/25/2022	0.9	finalizing and printing documents for client review and signature
Jaclyn	Maffetore	4/25/2022	1.7	visit with Kanautica Zayre-Brown to review/verify documents
Jaclyn	Maffetore	4/25/2022	4.7	travel to/from Anson CI
Jaclyn	Maffetore	4/26/2022	0.2	research re: medical records
Jaclyn	Maffetore	4/26/2022	0.2	call w/ DS re: next steps in light of denial of surgery
Jaclyn	Maffetore	4/26/2022	0.4	emails w/ legal team re: immediate next steps in light of formal denial of surgery
Jaclyn	Maffetore	4/26/2022	0.4	drafting/emailing expedited request for medical records
Jaclyn	Maffetore	4/26/2022	0.5	research re: local rules; summonses/waiver of service
Jaclyn	Maffetore	4/26/2022	1.5	editing complaint
Jaclyn	Maffetore	4/28/2022	0.3	finalizing complaint for filing preparing and emailing request for waiver, complaint, and partially completed waivers
Jaclyn	Maffetore	4/28/2022	0.7	to defendants' counsel
Jaclyn	Maffetore	4/28/2022	0.9	filing complaint
Jaclyn	Maffetore	4/28/2022	1	finalizing and submitting summonses
Jaclyn	Maffetore	4/29/2022	0.2	filing waivers of service

Jaclyn	Maffetore	4/29/2022	0.6 internal confs, emails re: scheduling evaluation with expert
Jaclyn	Maffetore	4/29/2022	0.7 drafting letter to client; email to team re: same
Jaclyn	Maffetore	5/10/2022	0.6 KZB lit team call
Jaclyn	Maffetore	5/19/2022	1 legal call w/ Kanautica + internal huddle
Jaclyn	Maffetore	5/23/2022	2.7 editing declaration
Jaclyn	Maffetore	5/25/2022	3.2 navigating security + client visit at Anson CI travel from Raleigh to CLT airport to pick up expert, from CLT airport to Anson CI, and
Jaclyn	Maffetore	5/25/2022	6.8 back.
Jaclyn	Maffetore	5/31/2022	0.9 litigation team call
Jaclyn	Maffetore	5/31/2022	1.8 editing client declaration
Jaclyn	Maffetore	6/1/2022	1.5 editing client decl and circulating same to team
Jaclyn	Maffetore	6/8/2022	1 legal call w/ client
Jaclyn	Maffetore	6/9/2022	1.3 reviewing and processing client correspondence
Jaclyn	Maffetore	6/13/2022	0.5 legal team call
Jaclyn	Maffetore	6/14/2022	2.2 editing expert declaration
Jaclyn	Maffetore	6/17/2022	0.2 email to opposing counsel re: ongoing issues
Jaclyn	Maffetore	6/18/2022	3.1 editing client declaration
Jaclyn	Maffetore	6/21/2022	0.3 finalizing KZB declaration and circulating to team
Jaclyn	Maffetore	6/21/2022	0.7 team call
Jaclyn	Maffetore	6/21/2022	1 legal call w/ KZB
Jaclyn	Maffetore	6/22/2022	0.5 preparing for meeting with client
Jaclyn	Maffetore	6/22/2022	1.5 meeting with client
Jaclyn	Maffetore	6/22/2022	4.5 travel to/from Anson CI for client visit
Jaclyn	Maffetore	6/24/2022	0.2 finalizing KZB declaration
Jaclyn	Maffetore	6/24/2022	0.7 reviewing defs' motion to dismiss brief
Jaclyn	Maffetore	6/24/2022	1.4 editing Ettner declaration
Jaclyn	Maffetore	6/27/2022	1.8 finalizing Ettner declaration; compiling + redacting appendices
Jaclyn	Maffetore	6/28/2022	0.4 litigation team call
Jaclyn	Maffetore	6/29/2022	0.2 drafting letter to client
Jaclyn	Maffetore	6/29/2022	1.8 reviewing and analyzing defts MTD
Jaclyn	Maffetore	6/30/2022	3.9 planning/drafting MTD facts section
Jaclyn	Maffetore	7/1/2022	0.3 reviewing draft + emails w/ opposing counsel re: request for extension
Jaclyn	Maffetore	7/1/2022	3.5 drafting MTD facts section
Jaclyn	Maffetore	7/5/2022	3.9 editing MTD response draft
Jaclyn	Maffetore	7/12/2022	1.1 editing motion to dismiss response brief
Jaclyn	Maffetore	7/15/2022	0.8 finalizing/filing MTD
Jaclyn	Maffetore	7/19/2022	0.4 litigation team call
Jaclyn	Maffetore	7/21/2022	0.2 call w/ MD re: extension filing
Jaclyn	Maffetore	7/21/2022	0.2 editing extension motion
Jaclyn	Maffetore	7/22/2022	0.9 reviewing defs MTD reply
Jaclyn	Maffetore	7/25/2022	0.7 legal call w/ KZB and follow-up w/ team re: same
Jaclyn	Maffetore	7/28/2022	0.5 correcting redaction errors and preparing document for correction w/ clerk
Jaclyn	Maffetore	7/29/2022	0.2 finalizing corrected doc 13-1 and emailing to court
Jaclyn	Maffetore	7/29/2022	2.2 reviewing/editing 2nd Ettner decl
Jaclyn	Maffetore	8/2/2022	2.1 editing/finalizing Ettner Decl. and appendix
Jaclyn	Maffetore	8/3/2022	0.5 conf w/ team re: opposing counsel request to move hearing date
Jaclyn	Maffetore	8/4/2022	0.2 conferring re: response to opposing counsel
Jaclyn	Maffetore	8/5/2022	0.2 email to opposing counsel re: ongoing medical care issues
Jaclyn	Maffetore	8/8/2022	1.5 reviewing/analyzing MTD reply
Jaclyn	Maffetore	8/9/2022	0.7 litigation team call
Jaclyn	Maffetore	8/9/2022	4.6 planning for MTD hearing
Jaclyn	Maffetore	8/10/2022	4.2 reviewing cases and formulating argument outline in preparation for MTD hearing
Jaclyn	Maffetore	8/11/2022	3.7 reviewing cases and formulating argument outline in preparation for MTD hearing
Jaclyn	Maffetore	8/12/2022	4.4 reviewing cases and formulating argument outline in preparation for MTD hearing
Jaclyn	Maffetore	8/15/2022	3.2 reviewing cases and formulating argument outline in preparation for MTD hearing

Jaclyn	Maffetore	8/16/2022	0.5 lit team call
Jaclyn	Maffetore	8/16/2022	1 reviewing/analyzing newly released 4th cir case for implications on MTD
Jaclyn	Maffetore	8/16/2022	1.5 first hearing moot
Jaclyn	Maffetore	8/16/2022	3.2 finalizing MTD hearing outline and preparing for moot
Jaclyn	Maffetore	8/17/2022	0.4 finalizing and filing notice of subsequent authority
Jaclyn	Maffetore	8/17/2022	1 legal call w/ Kanautica
Jaclyn	Maffetore	8/18/2022	0.2 call from Kanautica with factual updates
Jaclyn	Maffetore	8/18/2022	0.4 email to team re: call from Kanautica w/ factual updates and next steps
Jaclyn	Maffetore	8/18/2022	2.8 prepping for MTD hearing with eye toward incorporating feedback from first moot
Jaclyn	Maffetore	8/19/2022	2 second hearing moot prepping for MTD hearing/second moot with eye toward incorporating feedback from
Jaclyn	Maffetore	8/19/2022	3.6 first moot revising argument outline/preparing for hearing with eye toward feedback from second
Jaclyn	Maffetore	8/20/2022	1.6 moot
Jaclyn	Maffetore	8/22/2022	1.2 legal research in prep for hearing
Jaclyn	Maffetore	8/22/2022	1.2 finalizing outline for hearing
Jaclyn	Maffetore	8/22/2022	2.2 reviewing cases and outline in prep for hearing
Jaclyn	Maffetore	8/23/2022	1.5 appear/argue at MTD/PI hearing
Jaclyn	Maffetore	8/23/2022	2.9 traveling back from Charlotte for hearing and returning rental car
Jaclyn	Maffetore	8/24/2022	0.3 call w/ Kanautica to provide factual-only update re: hearing
Jaclyn	Maffetore	9/1/2022	1 legal call w/ client
Jaclyn	Maffetore	9/6/2022	0.7 litigation team call
Jaclyn	Maffetore	9/23/2022	1 reviewing MTD/PI decision, communications w/ team & client's husband re: same
Jaclyn	Maffetore	9/27/2022	0.3 coordinating w/ team re: availability to propose r. 26 f conf
Jaclyn	Maffetore	9/27/2022	0.6 finalizing documents to request UNC provider interviews
Jaclyn	Maffetore	9/27/2022	1 lit team call re: decision, discovery planning
Jaclyn	Maffetore	9/27/2022	1 reviewing updated client medical records
Jaclyn	Maffetore	9/28/2022	0.2 email re: interview request for UNC providers
Jaclyn	Maffetore	9/28/2022	0.7 legal call w/ Kanautica
Jaclyn	Maffetore	9/28/2022	1.7 drafting rule 26f report
Jaclyn	Maffetore	9/29/2022	0.3 emails to opposing counsel re: setting up 26f conf
Jaclyn	Maffetore	9/29/2022	2.1 drafting r 26f report + circulating to team for review/comment
Jaclyn	Maffetore	10/5/2022	0.3 editing draft rule 26f report
Jaclyn	Maffetore	10/6/2022	1.4 Reviewing draftg discovery requests/306b notice
Jaclyn	Maffetore	10/7/2022	0.5 reviewing answer
Jaclyn	Maffetore	10/11/2022	0.7 lit team call re: discovery planning; answer
Jaclyn	Maffetore	10/11/2022	0.7 drafting outline for Caraccio interview +circulating to team
Jaclyn	Maffetore	10/11/2022	1.2 reviewing defs' answer
Jaclyn	Maffetore	10/12/2022	0.2 internal meeting after Caraccio interview
Jaclyn	Maffetore	10/12/2022	0.2 finalizing draft 26f report and circulating same to opposing counsel
Jaclyn	Maffetore	10/12/2022	0.3 internal meeting before Caraccio interview
Jaclyn	Maffetore	10/12/2022	1.1 interview w/ Dr. Caraccio, UNC Health
Jaclyn	Maffetore	10/13/2022	0.5 26f conf w/ defs
Jaclyn	Maffetore	10/14/2022	0.7 reviewing defs 26f report edits
Jaclyn	Maffetore	10/14/2022	1.1 interview w/ Jennifer Dula
Jaclyn	Maffetore	10/18/2022	0.5 litigation team call re: discovery
Jaclyn	Maffetore	10/19/2022	0.3 finalizing and filing certificate of initial attorney conference
Jaclyn	Maffetore	10/20/2022	0.2 reviewing court's changes to proposed discovery schedule
Jaclyn	Maffetore	10/25/2022	0.3 editing draft disco requests
Jaclyn	Maffetore	10/25/2022	0.6 reviewing/editing initial disclosures
Jaclyn	Maffetore	10/25/2022	0.7 litigation team call re: discovery, initial disclosures
Jaclyn	Maffetore	10/25/2022	1 legal call w/ Kanautica
Jaclyn	Maffetore	10/26/2022	0.2 editing draft disco requests
Jaclyn	Maffetore	10/27/2022	0.2 reviewing defs initial disclosures
Jaclyn	Maffetore	10/27/2022	0.7 editing/finalizing/serving initial disclosures

Jaclyn	Maffetore	11/1/2022	1 reviewing/editing draft discovery
Jaclyn	Maffetore	11/15/2022	0.4 lit team call
Jaclyn	Maffetore	11/22/2022	0.8 lit team call
Jaclyn	Maffetore	11/22/2022	2.4 reviewing/editing draft PO and motion
Jaclyn	Maffetore	11/28/2022	1.4 finalizing edits to draft PO & motion; email to opposing counsel re: same
Jaclyn	Maffetore	12/5/2022	1.2 reviewing Defs' discovery responses; conf w/ DS, MD re: same
Jaclyn	Maffetore	12/8/2022	0.5 Figler interview
Jaclyn	Maffetore	12/9/2022	0.2 follow-up call w/ team after legal call
Jaclyn	Maffetore	12/9/2022	1 legal call w/ Kanautica
Jaclyn	Maffetore	12/13/2022	0.4 reviewing supplemental production
Jaclyn	Maffetore	12/13/2022	0.8 lit team call
Jaclyn	Maffetore	12/15/2022	0.2 emails w/ team, opposing counsel re: deposition scheduling
Jaclyn	Maffetore	12/19/2022	0.9 drafting client letter with substantive updates to send with documents
Jaclyn	Maffetore	12/20/2022	0.2 preparing for Croft interview
Jaclyn	Maffetore	12/20/2022	0.8 preparing for call w/ Dr. Ettner
Jaclyn	Maffetore	12/20/2022	0.8 drafting discovery review coding protocol
Jaclyn	Maffetore	12/20/2022	1 call w/ Dr. Ettner
Jaclyn	Maffetore	12/20/2022	1 litigation team call
Jaclyn	Maffetore	12/20/2022	1.2 call w/ Katherine Croft
Jaclyn	Maffetore	1/4/2023	0.2 conf, emails w/ team re: extension negotiations
Jaclyn	Maffetore	1/4/2023	0.5 drafting discovery responses
Jaclyn	Maffetore	1/5/2023	0.2 emails with opposing counsel re: extension request
Jaclyn	Maffetore	1/5/2023	0.3 editing motion for extension and proposed order
Jaclyn	Maffetore	1/5/2023	0.4 conf w/ DS re: depo prep
Jaclyn	Maffetore	1/5/2023	0.8 legal call w/ Kanautica
Jaclyn	Maffetore	1/5/2023	2.6 drafting KZB discovery responses
Jaclyn	Maffetore	1/6/2023	0.2 filing motion for extension and submitting proposed order
Jaclyn	Maffetore	1/6/2023	1.5 reviewing documents for discovery
Jaclyn	Maffetore	1/6/2023	3.9 drafting KZB discovery responses, circulating same to team
Jaclyn	Maffetore	1/9/2023	0.3 connecting Dr. Ettner to client; follow-up convo after client call
Jaclyn	Maffetore	1/10/2023	1.1 lit team call
Jaclyn	Maffetore	1/10/2023	5.7 doc review for production
Jaclyn	Maffetore	1/11/2023	0.5 conf w/ internal team re: depo prep
Jaclyn	Maffetore	1/11/2023	4.5 reviewing docs for production
Jaclyn	Maffetore	1/12/2023	0.4 finalizing production + hosting on FTP for defendants
Jaclyn	Maffetore	1/12/2023	1.9 editing/finalizing discovery responses
Jaclyn	Maffetore	1/12/2023	4.1 preparing for client deposition prep session
Jaclyn	Maffetore	1/13/2023	2.3 client deposition prep session
Jaclyn	Maffetore	1/13/2023	5 travel to/from Anson CI for client depo prep
Jaclyn	Maffetore	1/16/2023	3.7 preparing to defend deposition
Jaclyn	Maffetore	1/17/2023	0.2 emails w/ UNC Health paralegal re: subpoena
Jaclyn	Maffetore	1/17/2023	1.8 reviewing documents in advance of client deposition
Jaclyn	Maffetore	1/18/2023	5.3 travel to/from client deposition
Jaclyn	Maffetore	1/18/2023	5.9 client deposition + pre/break/post meetings
Jaclyn	Maffetore	1/23/2023	0.4 finalizing and serving subpoena on UNC Health
Jaclyn	Maffetore	1/24/2023	1 litigation team meeting
Jaclyn	Maffetore	1/27/2023	2.6 editing ettner report draft
Jaclyn	Maffetore	1/31/2023	0.2 follow-up w/ UNC health re: subpoena
Jaclyn	Maffetore	1/31/2023	0.6 reviewing edits to Ettner report, conf w/ DS re same
Jaclyn	Maffetore	1/31/2023	0.8 lit team call
Jaclyn	Maffetore	2/2/2023	1.7 document review of defendants' production
Jaclyn	Maffetore	2/3/2023	1.6 finalizing/serving Ettner expert report
Jaclyn	Maffetore	2/6/2023	0.4 reviewing/editing 30(b)(6) notice
Jaclyn	Maffetore	2/6/2023	0.7 reviewing UNC subpoena responses + accessing documents
Jaclyn	Maffetore	2/6/2023	1 defs doc review

Jaclyn	Maffetore	2/7/2023	0.4 lit team call
Jaclyn	Maffetore	2/7/2023	1.2 editing/finalizing 30(b)(6) notice
Jaclyn	Maffetore	2/9/2023	1 document review
Jaclyn	Maffetore	2/14/2023	3.5 document review
Jaclyn	Maffetore	2/15/2023	0.3 emails to opposing counsel re: 30(b)(6), R. 35
Jaclyn	Maffetore	2/15/2023	1 emails to team, internal confs re: R. 35 request
Jaclyn	Maffetore	2/15/2023	2.2 research re: R. 35
Jaclyn	Maffetore	2/16/2023	0.3 internal huddle with team following call w/ opposing counsel
Jaclyn	Maffetore	2/16/2023	0.5 call w/ opposing counsel re: R.35
Jaclyn	Maffetore	2/16/2023	0.8 document review
Jaclyn	Maffetore	2/16/2023	1.2 research re: R. 35
Jaclyn	Maffetore	2/17/2023	0.2 email w/ opposing counsel re: R. 35 position
Jaclyn	Maffetore	2/17/2023	0.4 emails to team re: client call
Jaclyn	Maffetore	2/17/2023	0.5 document review
Jaclyn	Maffetore	2/17/2023	0.7 legal call w/ Kanautica
Jaclyn	Maffetore	2/21/2023	2.4 reviewing/editing opp to R.35 motion
Jaclyn	Maffetore	2/22/2023	0.3 follow up email to team re: call w/ opposing counsel
Jaclyn	Maffetore	2/22/2023	0.7 call w/ opposing counsel re: 30(b)(6), settlement, extension
Jaclyn	Maffetore	2/22/2023	2.2 document review
Jaclyn	Maffetore	2/23/2023	0.2 email to opposing counsel re: extension
Jaclyn	Maffetore	2/23/2023	0.3 emails w/ team re: R. 35
Jaclyn	Maffetore	2/23/2023	1.6 document review
Jaclyn	Maffetore	2/24/2023	1.1 final review of R. 35 opp
Jaclyn	Maffetore	2/24/2023	1.4 document review
Jaclyn	Maffetore	2/24/2023	1.4 reviewing dep transcript for errors
Jaclyn	Maffetore	2/28/2023	0.2 reviewing discovery requests
Jaclyn	Maffetore	2/28/2023	1 litigation team call
Jaclyn	Maffetore	2/28/2023	2 reviewing deposition transcript for errors
Jaclyn	Maffetore	3/1/2023	0.7 reviewing deposition transcript
Jaclyn	Maffetore	3/2/2023	0.5 team call re: 30(b)(6) deposition planning
Jaclyn	Maffetore	3/2/2023	1 legal call w/ Kanautica
Jaclyn	Maffetore	3/2/2023	2.4 document review
Jaclyn	Maffetore	3/3/2023	0.2 email to opposing counsel re: time to discuss deposition logistics
Jaclyn	Maffetore	3/3/2023	0.7 editing 30(b)(6) notice
Jaclyn	Maffetore	3/6/2023	1.9 document review
Jaclyn	Maffetore	3/7/2023	0.4 finalizing and sending revised 30(b)(6) notice to opposing counsel
Jaclyn	Maffetore	3/7/2023	0.5 call w/ opposing counsel re: 30(b)(6) objections, logistics
Jaclyn	Maffetore	3/7/2023	1 litigation team call
Jaclyn	Maffetore	3/7/2023	1.2 drafting campbell 30(b)(6) deposition outline
Jaclyn	Maffetore	3/7/2023	1.5 document review w/ eye toward deposition prep
Jaclyn	Maffetore	3/8/2023	1.5 drafting deposition outline
Jaclyn	Maffetore	3/9/2023	0.8 team call re: 30(b)(6) depo
Jaclyn	Maffetore	3/9/2023	4.3 drafting deposition outline
Jaclyn	Maffetore	3/10/2023	0.2 reviewing emails from opposing counsel re: depo, late arriving production
Jaclyn	Maffetore	3/10/2023	6.2 deposition outline/exhibit prep
Jaclyn	Maffetore	3/14/2023	1 litigation team call
Jaclyn	Maffetore	3/14/2023	4 document review
Jaclyn	Maffetore	3/20/2023	0.2 sharing client update with team
Jaclyn	Maffetore	3/21/2023	0.6 legal call w/ Kanautica
Jaclyn	Maffetore	3/21/2023	1 litigation team call
Jaclyn	Maffetore	3/22/2023	0.6 finalizing and serving supplemented initial disclosures
Jaclyn	Maffetore	3/22/2023	1.1 reviewing documents in preparation of Campbell/30(b)(6) deposition
Jaclyn	Maffetore	3/23/2023	0.9 reviewing/editing discovery responses reviewing documents/drafting/editing outline in preparation of Campbell/30(b)(6)
Jaclyn	Maffetore	3/23/2023	2.2 deposition

			serving discovery responses and password for document access via emails to opposing
Jaclyn	Maffetore	3/27/2023	0.2 counsel; providing documents via fileshare
Jaclyn	Maffetore	3/27/2023	0.4 finalizing written discovery responses
Jaclyn	Maffetore	3/27/2023	1.5 compiling and finalizing second production of documents
Jaclyn	Maffetore	3/27/2023	3.4 reviewing and compiling documents for/drafting/editing Campbell/30(b)(6) outline
Jaclyn	Maffetore	3/28/2023	1 litigation team call
Jaclyn	Maffetore	4/3/2023	0.5 call w/ Dr. Ettner re: test materials and discovery dispute
Jaclyn	Maffetore	4/3/2023	0.6 legal call w/ Kanautica
Jaclyn	Maffetore	4/4/2023	0.7 litigation team call
Jaclyn	Maffetore	4/5/2023	0.9 finalizing/sending deficiency letter to opposing counsel
Jaclyn	Maffetore	4/6/2023	1.2 finalizing and serving supplemental disco responses
Jaclyn	Maffetore	4/6/2023	3.2 editing campbell depo outline
Jaclyn	Maffetore	4/13/2023	0.5 finalizing and serving updated notices of deposition for campbell and peiper
Jaclyn	Maffetore	4/13/2023	1 litigation team call
Jaclyn	Maffetore	4/13/2023	3.2 drafting/editing Campbell depo outline
Jaclyn	Maffetore	4/14/2023	0.2 emails w/ opposing counsel re: mediation, deposition scheduling
Jaclyn	Maffetore	4/17/2023	0.6 emails w/ opposing counsel re: reaching compromise on discovery/deposition dispute
Jaclyn	Maffetore	4/17/2023	1.6 editing Campbell deposition outline
Jaclyn	Maffetore	4/18/2023	2.5 finalizing Campbell/30(b)(6) deposition outline and exhibits
Jaclyn	Maffetore	4/18/2023	10 taking Dr. Campbell/30(b)(6) deposition + meetings to confer re: depo on breaks
Jaclyn	Maffetore	4/19/2023	0.2 reviewing second requests for production
Jaclyn	Maffetore	4/20/2023	1 lit team call
Jaclyn	Maffetore	4/20/2023	3.7 reviewing/compiling documents with eye toward drafting Junker deposition outline
Jaclyn	Maffetore	4/21/2023	1.7 drafting Junker deposition outline
Jaclyn	Maffetore	4/23/2023	2.5 drafting Junker deposition outline
Jaclyn	Maffetore	4/27/2023	0.6 litigation team call and follow-up email
Jaclyn	Maffetore	4/27/2023	1 legal call with Kanautica
Jaclyn	Maffetore	5/1/2023	0.2 emails w/ team re: R. 35
Jaclyn	Maffetore	5/2/2023	1 litigation team call
Jaclyn	Maffetore	5/2/2023	2.2 drafting/editing Junker depo outline
Jaclyn	Maffetore	5/3/2023	3.8 drafting/editing Junker depo outline
Jaclyn	Maffetore	5/4/2023	0.5 finalizing Junker depo outline
Jaclyn	Maffetore	5/4/2023	7.5 taking Junker depo and conferring w/ co-counsel on breaks
Jaclyn	Maffetore	5/8/2023	0.7 reviewing UNC declaration drafts
Jaclyn	Maffetore	5/8/2023	1 legal call w/ Kanautica
Jaclyn	Maffetore	5/9/2023	1 litigation team call
Jaclyn	Maffetore	5/9/2023	2.6 reviwing UNC declaration drafts
Jaclyn	Maffetore	5/10/2023	0.2 emails w/ opposing counsel re: depos, mx to extend
Jaclyn	Maffetore	5/10/2023	0.7 editing mx to extend and discussion re: same w/ team
Jaclyn	Maffetore	5/11/2023	0.2 emails w/ opposing counsel re: depo scheduling, conf w/ team re: same
Jaclyn	Maffetore	5/12/2023	0.3 emails w/ team re: court order
Jaclyn	Maffetore	5/16/2023	1 litigation team call
Jaclyn	Maffetore	5/18/2023	0.5 conf and emails w/ team re: discovery
Jaclyn	Maffetore	5/19/2023	0.3 finalizing and serving supplemental discovery
Jaclyn	Maffetore	5/19/2023	0.3 emails to opposing counsel re: discovery conf
Jaclyn	Maffetore	5/19/2023	0.4 drafting supplemental discovery responses
Jaclyn	Maffetore	5/19/2023	1.8 Peiper 30(b)(6) confidentiality designation
Jaclyn	Maffetore	5/19/2023	4.6 reviewing for privilege + redacting first supplemental production
Jaclyn	Maffetore	5/21/2023	3.2 Peiper 30(b)(6) confidentiality designations
Jaclyn	Maffetore	5/23/2023	1 lit team call
Jaclyn	Maffetore	5/24/2023	0.2 emails to opposing counsel re: discovery
Jaclyn	Maffetore	5/25/2023	0.2 looking into expert report issue raised, email to opposing re: same
Jaclyn	Maffetore	5/25/2023	0.5 call w/ opposing counsel re: R. 35, discovery; circulating notes re: same

Jaclyn	Maffetore	5/26/2023	0.2 drafting email and serving Zayre-Brown confidentiality designations on opposing counsel reviewing Campbell 30(b)(6) and individual capacity depos for confidentiality
Jaclyn	Maffetore	5/26/2023	4.6 designations
Jaclyn	Maffetore	5/30/2023	0.5 lit team call
Jaclyn	Maffetore	5/31/2023	1 emails w/ team & opposing counsel re: R. 35, discovery
Jaclyn	Maffetore	6/1/2023	0.2 conferring w/ team re: opposing counsel's discovery positions
Jaclyn	Maffetore	6/1/2023	0.4 emails to opposing counsel re: outstanding discovery issues
Jaclyn	Maffetore	6/1/2023	1.1 finalizing and serving second supplemental production + written responses
Jaclyn	Maffetore	6/6/2023	1 litigation team call
Jaclyn	Maffetore	6/8/2023	2.6 reviewing Junker deposition transcript w/ attention to confidentiality designations
Jaclyn	Maffetore	6/13/2023	0.6 legal call w/ Kanautica
Jaclyn	Maffetore	6/13/2023	1 litigation team call
Jaclyn	Maffetore	6/14/2023	0.4 drafting response to opposing counsel re: discovery
Jaclyn	Maffetore	6/14/2023	0.6 editing draft Dula declaration
Jaclyn	Maffetore	6/20/2023	0.2 reviewing emails from opposing counsel re: discovery issues
Jaclyn	Maffetore	6/20/2023	0.5 litigation team call
Jaclyn	Maffetore	6/21/2023	0.6 reviewing documents with eye toward bowman deposition prep
Jaclyn	Maffetore	6/22/2023	3.2 reviewing documents w/ eye toward Bowman deposition prep
Jaclyn	Maffetore	6/23/2023	3.4 Bowman depo outline/doc review
Jaclyn	Maffetore	6/26/2023	0.2 drafting bowman notice of deposition
Jaclyn	Maffetore	6/26/2023	3.8 drafting Bowman deposition outline & compiling documents
Jaclyn	Maffetore	6/27/2023	1.2 litigation team call
Jaclyn	Maffetore	6/29/2023	3 Bowman deposition and internal confs during breaks
Jaclyn	Maffetore	7/7/2023	1.6 reviewing expert reports; conf w/ DS re: same
Jaclyn	Maffetore	7/10/2023	0.6 huddle with DS re: expert discovery, SJ
Jaclyn	Maffetore	7/11/2023	0.7 legal call w/ KZB
Jaclyn	Maffetore	7/11/2023	1 litigation team call
Jaclyn	Maffetore	7/17/2023	1.2 reviewing/analyzing expert reports
Jaclyn	Maffetore	7/18/2023	1 litigation team call
Jaclyn	Maffetore	7/20/2023	0.2 emails w/ opposing counsel re: depos
Jaclyn	Maffetore	7/25/2023	0.7 reviewing/editing Ettner rebuttal
Jaclyn	Maffetore	7/27/2023	0.3 reviewing/OCR-ing final version of Ettner rebuttal
Jaclyn	Maffetore	7/27/2023	2.3 bowman confidentiality designations
Jaclyn	Maffetore	7/31/2023	0.2 conf w/ DS re: Penn subpoena
Jaclyn	Maffetore	7/31/2023	0.4 drafting/editing/circulating/serving updated initial disclosures
Jaclyn	Maffetore	7/31/2023	0.8 drafting/circulating/editing/serving Penn subpoena + attachment, notice of deposition
Jaclyn	Maffetore	7/31/2023	1.8 planning Penn depo outline
Jaclyn	Maffetore	7/31/2023	2.3 reviewing Boyd examination video
Jaclyn	Maffetore	8/1/2023	0.5 reviewing/editing Antommaria rebuttal report
Jaclyn	Maffetore	8/1/2023	0.9 lit team call
Jaclyn	Maffetore	8/1/2023	1.8 reviewing documents/drafting Penn depo outline
Jaclyn	Maffetore	8/2/2023	0.7 legal call w/ Kanautica
Jaclyn	Maffetore	8/2/2023	2.5 reviewing docs w/ eye toward and drafting Penn deposition outline
Jaclyn	Maffetore	8/4/2023	5.8 reviewing documents/drafting Penn deposition outline
Jaclyn	Maffetore	8/5/2023	3.7 reviewing documents/drafting Penn deposition outline
Jaclyn	Maffetore	8/6/2023	1.8 reviewing documents/drafting Penn deposition outline
Jaclyn	Maffetore	8/7/2023	0.2 finalizing/serving expert rebuttal reports
Jaclyn	Maffetore	8/7/2023	0.3 reviewing Penn subpoena documents
Jaclyn	Maffetore	8/7/2023	0.8 finalizing Penn deposition outline
Jaclyn	Maffetore	8/8/2023	8.5 taking deposition of Dr. Penn + conf w/ team on breaks
Jaclyn	Maffetore	8/10/2023	1.2 reviewing defs' mot. for continuance, emails w/ co- and opposing counsel re: same
Jaclyn	Maffetore	8/11/2023	0.3 editing revised mot for trial continuance, email of same to opposing counsel
Jaclyn	Maffetore	8/11/2023	0.5 drafting mot to take deposition out of time

Jaclyn	Maffetore	8/15/2023	0.3 client call & email to team re: same
Jaclyn	Maffetore	8/15/2023	0.5 circulating, finalizing, filing motion to take deposition out of time
Jaclyn	Maffetore	8/17/2023	1.5 reviewing Penn depo rough w/ eye toward Daubert
Jaclyn	Maffetore	8/17/2023	2 planning SJ
Jaclyn	Maffetore	8/18/2023	1 reviewing Penn depo rough w/ eye toward Daubert
Jaclyn	Maffetore	8/18/2023	1.2 reviewing Daubert research from extern
Jaclyn	Maffetore	8/22/2023	0.5 reviewing Penn rough w/ eye towards Daubert
Jaclyn	Maffetore	8/23/2023	0.2 conf w/ DS re Daubert, SJ
Jaclyn	Maffetore	8/23/2023	0.5 legal call w/ KZB
Jaclyn	Maffetore	8/23/2023	0.8 Daubert planning
Jaclyn	Maffetore	8/23/2023	1.1 KZB lit team call
Jaclyn	Maffetore	8/29/2023	0.4 Litigation team call
Jaclyn	Maffetore	8/30/2023	1.1 reviewing/editing Croft declaration
Jaclyn	Maffetore	8/30/2023	1.1 SJ planning
Jaclyn	Maffetore	8/31/2023	1.2 planning for summary judgment
Jaclyn	Maffetore	9/5/2023	1 SJ outline
Jaclyn	Maffetore	9/7/2023	1.2 finalizing third party declarations
Jaclyn	Maffetore	9/8/2023	0.3 correspondence re: 3rd party declarants
Jaclyn	Maffetore	9/11/2023	1.3 SJ outline
Jaclyn	Maffetore	9/11/2023	1.7 Penn confidentiality designations
Jaclyn	Maffetore	9/12/2023	0.8 lit team call
Jaclyn	Maffetore	9/12/2023	1.7 Penn confidentiality designations
Jaclyn	Maffetore	9/13/2023	1.8 SJ outline
Jaclyn	Maffetore	9/13/2023	3.4 reviewing deposition transcripts/compiling facts for SJ
Jaclyn	Maffetore	9/14/2023	0.7 legal call w/ Kanautica
Jaclyn	Maffetore	9/14/2023	3.9 reviewing deposition transcripts/compiling facts for SJ
Jaclyn	Maffetore	9/15/2023	0.2 reviewing/editing draft motion to extend SJ page limits
Jaclyn	Maffetore	9/15/2023	0.3 follow-up call and email to potential third party witness
Jaclyn	Maffetore	9/15/2023	0.4 emails w/ opposing, co-counsel re: draft motion to extend
Jaclyn	Maffetore	9/15/2023	4.1 reviewing deposition transcripts/compiling facts for SJ
Jaclyn	Maffetore	9/18/2023	0.2 correspondence w/ opposing counsel re: motion to extend
Jaclyn	Maffetore	9/18/2023	0.2 finalizing/filing mot to extend
Jaclyn	Maffetore	9/19/2023	1.5 legal research/SJ planning
Jaclyn	Maffetore	9/20/2023	2.2 legal research/SJ planning/drafting
Jaclyn	Maffetore	9/21/2023	3.8 legal research/SJ planning/drafting
Jaclyn	Maffetore	9/22/2023	7.3 SJ research/drafting
Jaclyn	Maffetore	9/26/2023	0.2 emails w/ team re: Penn invoices, responding re: rates
Jaclyn	Maffetore	9/26/2023	6.2 SJ brief drafting
Jaclyn	Maffetore	9/27/2023	8 SJ brief drafting
Jaclyn	Maffetore	9/28/2023	0.3 reviewing/editing second KZB declaration
Jaclyn	Maffetore	9/28/2023	0.6 evidence planning re: SJ
Jaclyn	Maffetore	9/28/2023	1 lit team call re: SJ reviewing edits to 3rd party declaration, communications w/ UNC paralegal, co-counsel
Jaclyn	Maffetore	9/29/2023	0.3 re: same
Jaclyn	Maffetore	9/29/2023	6.7 editing SJ brief
Jaclyn	Maffetore	9/30/2023	5.6 editing SJ brief
Jaclyn	Maffetore	10/2/2023	0.3 finalizing declaration
Jaclyn	Maffetore	10/2/2023	0.5 legal call w/ Kanautica
Jaclyn	Maffetore	10/2/2023	5.6 SJ brief drafting/editing
Jaclyn	Maffetore	10/4/2023	0.2 email to opposing counsel re: confidentiality designations
Jaclyn	Maffetore	10/4/2023	1.5 declaration designations in support of SJ
Jaclyn	Maffetore	10/4/2023	8.7 SJ brief editing/fact-cite checking
Jaclyn	Maffetore	10/5/2023	6.3 finalizing and filing SJ motion, brief, and exhibits
Jaclyn	Maffetore	10/6/2023	1.2 reviewing/analyzing defs SJ filings
Jaclyn	Maffetore	10/10/2023	1.3 legal team call and follow-up call w/ Dan re: response division of labor

Jaclyn	Maffetore	10/10/2023	1.4 reviewing/analyzing defs mot for SJ
Jaclyn	Maffetore	10/11/2023	2.2 planning/researching SJ response
Jaclyn	Maffetore	10/12/2023	7.2 planning/researching SJ response
Jaclyn	Maffetore	10/16/2023	6.6 response section research/drafting
Jaclyn	Maffetore	10/17/2023	1 reviewing confidentiality designations for redaction
Jaclyn	Maffetore	10/17/2023	1 reviewing SJ response brief edits
Jaclyn	Maffetore	10/17/2023	2.2 research/drafting Daubert of Penn
Jaclyn	Maffetore	10/18/2023	4.8 editing response brief
Jaclyn	Maffetore	10/19/2023	0.2 filing response brief
Jaclyn	Maffetore	10/19/2023	1.2 response brief final proofread/finalization
Jaclyn	Maffetore	10/20/2023	0.2 correcting filing of exhibit
Jaclyn	Maffetore	10/20/2023	0.6 lit team call re: SJ
Jaclyn	Maffetore	10/20/2023	1.5 reviewing/analyzing defs response brief
Jaclyn	Maffetore	10/20/2023	4.2 research/drafting Penn Daubert
Jaclyn	Maffetore	10/22/2023	6.5 drafting Penn Daubert
Jaclyn	Maffetore	10/23/2023	2.5 editing draft reply br.
Jaclyn	Maffetore	10/23/2023	3.8 drafting/editing Penn Daubert
Jaclyn	Maffetore	10/24/2023	1.7 editing reply br
Jaclyn	Maffetore	10/24/2023	2.4 editing Penn Daubert
Jaclyn	Maffetore	10/25/2023	0.3 reviewing/editing draft motion to strike
Jaclyn	Maffetore	10/25/2023	1.9 drafting new section of Penn brief
Jaclyn	Maffetore	10/25/2023	2.2 editing Penn brief
Jaclyn	Maffetore	10/26/2023	0.7 filing SJ reply + 3 motions to strike and supporting materials
Jaclyn	Maffetore	10/26/2023	0.7 final proofread of reply brief
Jaclyn	Maffetore	10/26/2023	0.9 final proofread and citation input for memos ISO motion to strike
Jaclyn	Maffetore	10/26/2023	1.6 cite-checking Penn brief
Jaclyn	Maffetore	10/30/2023	0.2 email to Kanautica sharing filings
Jaclyn	Maffetore	10/30/2023	0.4 finalizing and filing opposition to motion for extension
Jaclyn	Maffetore	10/31/2023	1 lit team call
Jaclyn	Maffetore	11/1/2023	0.2 call w/ Kanautica
Jaclyn	Maffetore	11/1/2023	0.3 conf w/ team re: upcoming hearing
Jaclyn	Maffetore	11/1/2023	0.8 hearing prep
Jaclyn	Maffetore	11/2/2023	4.2 hearing prep
Jaclyn	Maffetore	11/3/2023	6.2 hearing prep
Jaclyn	Maffetore	11/6/2023	6.2 hearing prep (case review, record review, reviewing briefs, drafting outline)
Jaclyn	Maffetore	11/7/2023	1.2 argument moot
Jaclyn	Maffetore	11/7/2023	7.7 hearing prep (case review, record review, refining outline, argument practice)
Jaclyn	Maffetore	11/8/2023	0.6 conf w/ DS re: hearing
Jaclyn	Maffetore	11/8/2023	2.7 travelling to charlotte hearing
Jaclyn	Maffetore	11/8/2023	6.2 hearing prep (case review, record review, refining outline, argument practice)
Jaclyn	Maffetore	11/9/2023	0.4 argument debrief
Jaclyn	Maffetore	11/9/2023	0.7 meeting with client prior to argument
Jaclyn	Maffetore	11/9/2023	1.7 SJ oral argument
Jaclyn	Maffetore	11/9/2023	2.7 traveling home from charlotte hearing
Jaclyn	Maffetore	11/16/2023	1 litigation team meeting
Jaclyn	Maffetore	11/30/2023	0.8 legal call w/ Kanautica and follow-up w/ team
Jaclyn	Maffetore	12/4/2023	0.5 reviewing draft motion to continue; emails with co- and opposing counsel re: same
Jaclyn	Maffetore	12/6/2023	0.5 drafting email response re: third party witnesses, email to team re: same
Jaclyn	Maffetore	12/12/2023	1 reviewing/analyzing defs resp to motions to strike
Jaclyn	Maffetore	12/13/2023	2.2 reviewing/analyzing defs resp to motions to strike
Jaclyn	Maffetore	12/15/2023	3 reviewing/editing reply brief and discussions w/ DS re: same
Jaclyn	Maffetore	12/18/2023	1 cite-checking reply ISO motions to strike
Jaclyn	Maffetore	12/19/2023	0.7 lit team call
Jaclyn	Maffetore	1/2/2024	1 lit team meeting
Jaclyn	Maffetore	1/9/2024	0.2 email to opposing counsel

Jaclyn	Maffetore	1/9/2024	1 lit team call
Jaclyn	Maffetore	1/10/2024	0.2 emails w/ opposing counsel re: setting up call
Jaclyn	Maffetore	1/10/2024	0.3 clarifying email to 3rd party witnesses
Jaclyn	Maffetore	1/16/2024	1 lit team call
Jaclyn	Maffetore	2/1/2024	1 lit team call
Jaclyn	Maffetore	2/2/2024	0.2 call w/ DS discussing order
Jaclyn	Maffetore	2/2/2024	0.3 email to client w/ update re: order
Jaclyn	Maffetore	2/2/2024	0.4 team call re: order
Jaclyn	Maffetore	2/2/2024	0.5 reviewing order
Jaclyn	Maffetore	2/3/2024	1 team call re: order, hearing
Jaclyn	Maffetore	2/5/2024	0.6 call w/ Expert re: order, medical situation drafting email to opposing counsel re: remote testimony, clerk outreach, client
Jaclyn	Maffetore	2/6/2024	0.2 attendance issue
Jaclyn	Maffetore	2/6/2024	0.4 review Ettner declaration
Jaclyn	Maffetore	2/6/2024	1 lit team call
Jaclyn	Maffetore	2/7/2024	1.2 Campbell outline
Jaclyn	Maffetore	2/7/2024	1.6 editing motion + memo ISO remote testimony of Dr. Ettner
Jaclyn	Maffetore	2/8/2024	0.2 call w/ Cogburn judicial assistant re: hearing
Jaclyn	Maffetore	2/8/2024	0.2 filing motion, memo, declaration ISO remote testimony
Jaclyn	Maffetore	2/8/2024	0.3 finalizing remote testimony materials; circulating to opposing counsel
Jaclyn	Maffetore	2/8/2024	0.5 lit team call
Jaclyn	Maffetore	2/8/2024	0.5 call conferring w/ opposing counsel drafting, getting input, sending email to opposing counsel re: stipulated hearing
Jaclyn	Maffetore	2/8/2024	0.5 procedure.
Jaclyn	Maffetore	2/8/2024	1 legal call w/ client
Jaclyn	Maffetore	2/9/2024	0.5 legal call w/ client
Jaclyn	Maffetore	2/9/2024	2.2 Campbell outline
Jaclyn	Maffetore	2/11/2024	2.5 Campbell outline
Jaclyn	Maffetore	2/12/2024	0.2 filing habeas petition for client appearance
Jaclyn	Maffetore	2/12/2024	0.5 reviewing/editing habeas petition, emails to team re: same reviewing depo transcripts with eye toward drafting Campbell outline; drafting campbell
Jaclyn	Maffetore	2/12/2024	6.7 outline
Jaclyn	Maffetore	2/13/2024	0.3 emails w/ opposing counsel re: stipulated procedure for filing
Jaclyn	Maffetore	2/13/2024	0.3 communications w/ opposing counsel, facility, re: client transport to hearing
Jaclyn	Maffetore	2/13/2024	1 lit team call
Jaclyn	Maffetore	2/13/2024	1.6 Peiper outline reviewing depo transcripts with eye toward drafting Campbell outline; drafting campbell
Jaclyn	Maffetore	2/13/2024	3.2 outline call w/ courtroom deputy re: tech logistics/training; emails to team, opposing counsel
Jaclyn	Maffetore	2/14/2024	0.5 re: same
Jaclyn	Maffetore	2/14/2024	1 editing campbell outline reviewing depo transcripts with eye toward drafting Peiper outline; simultaneously
Jaclyn	Maffetore	2/14/2024	4 drafting Peiper outline reviewing depo trasncripts with eye toward drafting Peiper outline; simultaneously
Jaclyn	Maffetore	2/15/2024	5 drafting Peiper outline
Jaclyn	Maffetore	2/16/2024	1.8 editing Peiper and Campbell outlines
Jaclyn	Maffetore	2/17/2024	1 reviewing defs' ex for necessary redactions - email to opposing counsel re: same
Jaclyn	Maffetore	2/17/2024	1 lit team call re: hearing
Jaclyn	Maffetore	2/18/2024	2.2 finalizing Campbell and Peiper outlines
Jaclyn	Maffetore	2/19/2024	1.2 reviewing outlines and documents in preparation for hearing
Jaclyn	Maffetore	2/19/2024	2.5 traveling to CLT for evidentiary hearing
Jaclyn	Maffetore	2/20/2024	0.5 technology training
Jaclyn	Maffetore	2/20/2024	1 team huddles re: hearing strategy
Jaclyn	Maffetore	2/20/2024	2 reviewing documents and outline in preparation for hearing
Jaclyn	Maffetore	2/20/2024	2.5 traveling home from evidentiary hearing

Jaclyn	Maffetore	2/20/2024	3.4 evidentiary hearing
Jaclyn	Maffetore	2/26/2024	1.8 reviewing/editing draft brief ISO renewed mot for SJ
Jaclyn	Maffetore	2/28/2024	0.8 reviewing renewed SJ motion and memo ISO
Jaclyn	Maffetore	2/29/2024	1.2 cite-checking/reviewing memo ISO renewed motion for SJ
Jaclyn	Maffetore	3/7/2024	0.3 email outreach to client w/ briefing and updates
Jaclyn	Maffetore	3/12/2024	0.2 email to client re: order w/ expedited briefing schedule for renewed MSJ
Jaclyn	Maffetore	3/12/2024	0.4 legal call w/ client re: continuance
Jaclyn	Maffetore	3/15/2024	0.6 finalizing + filing motion to continue trial
Jaclyn	Maffetore	3/21/2024	0.8 reviewing defs MSJ filings
Jaclyn	Maffetore	3/22/2024	0.5 lit team call re: drafting plan for reply/response
Jaclyn	Maffetore	3/22/2024	3.5 reviewing defs motion for renewed MSJ and opposition to Ps renewed MSJ
Jaclyn	Maffetore	3/23/2024	3 drafting reply ISO renewed MSJ
Jaclyn	Maffetore	3/24/2024	4 drafting reply ISO renewed MSJ
Jaclyn	Maffetore	3/25/2024	4.1 revising renewed MSJ reply brief
Jaclyn	Maffetore	3/26/2024	2.1 planning response in opp to defs renewed MSJ
Jaclyn	Maffetore	3/26/2024	4 finalizing + filing reply ISO renewed MSJ
Jaclyn	Maffetore	3/27/2024	5 planning/drafting opposition to defs MSJ
Jaclyn	Maffetore	3/29/2024	3.7 drafting opp to defs renewed MSJ
Jaclyn	Maffetore	3/30/2024	2.1 editing draft response in opp to defs' renewed MSJ
Jaclyn	Maffetore	4/1/2024	0.2 filing response in opp to defs renewed msj
Jaclyn	Maffetore	4/1/2024	2.2 editing/finalizing response in opp to defs renewed MSJ
Jaclyn	Maffetore	4/4/2024	0.5 reviewing defendants reply ISO renewed MSJ
Jaclyn	Maffetore	4/16/2024	1.6 reviewing SJ order, emails to team re: same
Jaclyn	Maffetore	4/18/2024	0.5 legal call w/ Kanautica
Jaclyn	Maffetore	4/18/2024	0.5 litigation team call
Jaclyn	Maffetore	4/23/2024	0.2 litigation team call
Jaclyn	Maffetore	4/26/2024	0.5 legal call w/ client
Jaclyn	Maffetore	5/3/2024	0.5 client legal call
Jaclyn	Maffetore	5/10/2024	0.5 legal call w/ client
Jaclyn	Maffetore	5/14/2024	0.6 litigation team call
Jaclyn	Maffetore	5/15/2024	0.3 emails w/ team, opposing counsel re: intent to file notice of appeal and motion to stay
Jaclyn	Maffetore	5/15/2024	0.7 research for stay opp
Jaclyn	Maffetore	5/16/2024	0.9 reviewing/analyzing motion to stay
Jaclyn	Maffetore	5/16/2024	3.6 legal research/planning resp. in opp to mot to stay
Jaclyn	Maffetore	5/17/2024	0.5 legal call w/ Kanautica
Jaclyn	Maffetore	5/17/2024	0.5 reviewing co-counsel analysis re: mot to stay opp
Jaclyn	Maffetore	5/18/2024	4.4 legal research/drafting stay opp
Jaclyn	Maffetore	5/19/2024	4.2 legal research/drafting stay opp
Jaclyn	Maffetore	5/20/2024	5.2 research/drafting stay opp
Jaclyn	Maffetore	5/28/2024	0.5 client legal call and team huddle to debrief client call
Jaclyn	Maffetore	6/3/2024	0.2 email to team re: stay, mot to expedite
Jaclyn	Maffetore	6/4/2024	0.5 lit team meeting
Jaclyn	Maffetore	6/6/2024	1.2 stay-related research
Jaclyn	Maffetore	6/12/2024	0.5 client communications
Jaclyn	Maffetore	6/26/2024	0.3 conf w/ DS re: plan for appellate briefing
Jaclyn	Maffetore	7/1/2024	0.2 call w/ client and update to team re: same
Jaclyn	Maffetore	7/1/2024	0.3 procedural research re: timeline for JA/record on appeal
Jaclyn	Maffetore	7/8/2024	0.5 finalizing and filing letter to court requesting case status
Jaclyn	Maffetore	7/9/2024	0.8 lit team meeting
Jaclyn	Maffetore	7/11/2024	0.2 communication w/ client, email update to team re: same emails w/ opposing counsel re: JA, issues on appeal, procedural research to include in
Jaclyn	Maffetore	7/12/2024	0.3 same
Jaclyn	Maffetore	7/12/2024	1 reviewing court order re: stay; emails to/confs w/ team re: same
Jaclyn	Maffetore	7/16/2024	0.5 legal call w/ client

Jaclyn	Maffetore	7/16/2024	0.9 litigation team meeting
Jaclyn	Maffetore	7/18/2024	0.2 calls/emails re: communications w/ 4th cir clerk re: admin stay, deadlines
Jaclyn	Maffetore	7/18/2024	1.2 reviewing defs' stay motion
Jaclyn	Maffetore	7/18/2024	6.2 drafting stay opposition brief background section
Jaclyn	Maffetore	7/19/2024	6.4 combining/editing stay opp brief for circulation to team
Jaclyn	Maffetore	7/20/2024	1.2 reviewing team edits to stay opp brief
Jaclyn	Maffetore	7/21/2024	7.1 editing, finalizing, and filing 4th cir stay opposition
Jaclyn	Maffetore	7/24/2024	0.2 call w/ opposing counsel re: length of JA, emails with team re: same
Jaclyn	Maffetore	7/25/2024	0.4 reviewing stay denial
Jaclyn	Maffetore	7/25/2024	0.8 reviewing JA designations for cuts for length, emails to team re: same
Jaclyn	Maffetore	7/26/2024	0.8 reviewing defs filings re: experts, email confs w/ team re: same
Jaclyn	Maffetore	7/28/2024	0.5 reviewing draft objex
Jaclyn	Maffetore	7/28/2024	1.8 reviewing research/feedback re: proposed GAS "experts"
Jaclyn	Maffetore	7/29/2024	0.6 lit team call re: objex
Jaclyn	Maffetore	7/29/2024	1.8 reviewing research/feedback re: proposed GAS "experts"
Jaclyn	Maffetore	7/29/2024	2.6 editing draft response to defs designations
Jaclyn	Maffetore	7/30/2024	1 finalizing and filing response to defs' expert filing
Jaclyn	Maffetore	7/30/2024	1 lit team call
Jaclyn	Maffetore	7/30/2024	2.7 reviewing defs opening appeal brief
Jaclyn	Maffetore	7/31/2024	1.8 planning response br
Jaclyn	Maffetore	7/31/2024	2 reviewing defs opening br
Jaclyn	Maffetore	7/31/2024	2.2 legal research re: PLRA issues
Jaclyn	Maffetore	8/1/2024	0.5 legal call w/ KZB
Jaclyn	Maffetore	8/1/2024	2.6 legal research/planning for appellate response br.
Jaclyn	Maffetore	8/2/2024	1 Planning/research re: appellate brief
Jaclyn	Maffetore	8/5/2024	1.9 legal research/planning appellate brief
Jaclyn	Maffetore	8/6/2024	2.5 drafting appellate response brief
Jaclyn	Maffetore	8/7/2024	3.5 drafting appellate response brief
Jaclyn	Maffetore	8/9/2024	3.2 drafting appellate response brief
Jaclyn	Maffetore	8/12/2024	4.3 drafting appellate response brief
Jaclyn	Maffetore	8/13/2024	0.6 lit team meeting re: hearing
Jaclyn	Maffetore	8/13/2024	5.1 drafting/editing appellate response brief for circulation of draft to full team
Jaclyn	Maffetore	8/15/2024	2.2 drafting hearing prep document and sharing to team
Jaclyn	Maffetore	8/16/2024	0.2 team meeting following hearing
Jaclyn	Maffetore	8/16/2024	0.8 remote hearing before J. Cogburn
Jaclyn	Maffetore	8/16/2024	1.5 Hearing prep
Jaclyn	Maffetore	8/19/2024	2.1 editing appellate brief
Jaclyn	Maffetore	8/20/2024	1 drafting revised response re: permanent injunction
Jaclyn	Maffetore	8/20/2024	3.4 editing appellate brief
Jaclyn	Maffetore	8/21/2024	3.8 editing appeal brief
Jaclyn	Maffetore	8/22/2024	0.5 legal call cite-checking/incorporating others' cite-checks/edits into near-final draft of appellate
Jaclyn	Maffetore	8/22/2024	5.9 resp brief
Jaclyn	Maffetore	8/23/2024	0.5 finalizing and filing notice re: permanent injunction order
Jaclyn	Maffetore	8/26/2024	4.2 finalizing appellate response br and filing
Jaclyn	Maffetore	9/10/2024	0.5 lit team call
Jaclyn	Maffetore	9/13/2024	0.5 draft letter to Cogburn re: case status
Jaclyn	Maffetore	9/17/2024	2 reviewing reply brief
Jaclyn	Maffetore	9/23/2024	0.5 reviewing order from court re: remedial process, conf w team re: same
Jaclyn	Maffetore	9/24/2024	0.5 lit team call
Jaclyn	Maffetore	9/24/2024	0.7 emails to team re: court order, scheduling legal call
Jaclyn	Maffetore	9/27/2024	0.5 draft mot to continue
Jaclyn	Maffetore	10/1/2024	0.5 legal call w/ KZB
Jaclyn	Maffetore	10/7/2024	0.3 outreach to opposing counsel/conf w/ team re: pretrial deadlines
Jaclyn	Maffetore	10/22/2024	0.6 litigation team call

Jaclyn	Maffetore	10/25/2024	0.5 legal call w/ Kanautica
Jaclyn	Maffetore	10/25/2024	1.5 research/drafting MTD appeal (became supplemental brief)
Jaclyn	Maffetore	10/30/2024	2.5 research/drafting MTD appeal (became supplemental brief)
Jaclyn	Maffetore	11/1/2024	0.4 finalizing draft continuance; sending same to opposing counsel; filing same
Jaclyn	Maffetore	11/7/2024	0.2 emails w/ opposing counsel re: missing redactions
Jaclyn	Maffetore	11/7/2024	0.8 lit team call reviewing/collecting thoughts re: defs filings; reviewing teams circulated thoughts re:
Jaclyn	Maffetore	11/7/2024	2 same
Jaclyn	Maffetore	11/8/2024	2.5 planning response
Jaclyn	Maffetore	11/12/2024	2.2 draft/edit 4th cir filing
Jaclyn	Maffetore	11/13/2024	3.7 drafting/editing 4th cir supplemental brief
Jaclyn	Maffetore	11/14/2024	0.2 draft email to opposing counsel re: motion to dismiss appeal
Jaclyn	Maffetore	11/14/2024	0.4 reviewing edits to 4th cir filing
Jaclyn	Maffetore	11/15/2024	0.2 further emails to opposing counsel re: motion to dismiss
Jaclyn	Maffetore	11/15/2024	3.5 plan/draft response to notice of compliance
Jaclyn	Maffetore	11/17/2024	3.2 draft response to notice of compliance
Jaclyn	Maffetore	11/18/2024	3.8 editing/cite-checking 4th cir filing
Jaclyn	Maffetore	11/19/2024	0.2 finalizing motion to dismiss
Jaclyn	Maffetore	11/19/2024	0.2 filing mot to dismiss and supplemental brief
Jaclyn	Maffetore	11/19/2024	1 reviewing tables for 4th cir finalization
Jaclyn	Maffetore	11/19/2024	1.4 revising draft response to notice of compliance
Jaclyn	Maffetore	11/20/2024	2.2 revising draft response to notice of compliance
Jaclyn	Maffetore	6/25/2025	2 compiling my hours for fee petition; culling vague/duplicative entries
Jaclyn	Maffetore	7/2/2025	1.8 researching/drafting fee petition memo
Jaclyn	Maffetore	7/3/2025	2.1 researching/drafting fee petition memo
Jaclyn	Maffetore	7/7/2025	2.8 researching/drafting fee petition memo
Jaclyn	Maffetore	7/8/2025	1.1 legal research re: fee awards similar cases
Jaclyn	Maffetore	7/8/2025	3.5 drafting fee petition memo
Jaclyn	Maffetore	7/9/2025	1.2 drafting fee petition memo; circulating same to team
Jaclyn	Maffetore	7/15/2025	2 further culling time entries for fee petition
Jaclyn	Maffetore	7/16/2025	2.2 editing fee petition
Jaclyn	Maffetore	7/18/2025	0.5 drafting attorney fee motion; circulating same to team

TOTAL:	1011.1
Fee Petition:	19.2

ATTACHMENT 2 - Timesheet for Daniel Siegel

First Name	Last Name	Date	Hours	Description
Daniel	Siegel	1/18/2022	1	Team meeting
Daniel	Siegel	1/21/2022	1	Call with client
Daniel	Siegel	1/25/2022	0.8	Review Taylor's complaint edits
Daniel	Siegel	1/25/2022	1	team call
Daniel	Siegel	3/3/2022	1	Client call
Daniel	Siegel	3/8/2022	1	Team meeting
Daniel	Siegel	3/22/2022	1.5	Call with client re case status
Daniel	Siegel	3/24/2022	0.2	Emails with team re arranging in-person visit with client
Daniel	Siegel	3/25/2022	0.3	Emails with team concerning prison denial of Dr. Ettner's visit and potential need for motion to compel
Daniel	Siegel	3/29/2022	1	Team meeting
Daniel	Siegel	4/5/2022	0.2	Review updated complaint
Daniel	Siegel	4/6/2022	2.8	Edit complaint and emails to team re same
Daniel	Siegel	4/12/2022	1	Call with client
Daniel	Siegel	4/19/2022	1	Team meeting
Daniel	Siegel	4/28/2022	0.5	Final review of complaint
Daniel	Siegel	6/24/2022	7	Draft response to defendants' motion to dismiss
Daniel	Siegel	6/27/2022	2.8	Draft response to Defendants' motion to dismiss
Daniel	Siegel	6/28/2022	3	Draft response to Defendants' motion to dismiss
Daniel	Siegel	7/5/2022	3.4	Edit response to MTD
Daniel	Siegel	7/11/2022	1.7	Edit MTD response brief
Daniel	Siegel	8/16/2022	2	Moot for hearing
Daniel	Siegel	8/19/2022	2	Moot for hearing
Daniel	Siegel	9/30/2022	0.3	Review and edit discovery requests
Daniel	Siegel	10/12/2022	1	Interview with Dr. Caraccio
Daniel	Siegel	12/13/2022	0.5	Litigation team meeting
Daniel	Siegel	1/10/2023	0.5	Team meeting
Daniel	Siegel	1/13/2023	7	Depo prep with client; travel to and from Anson CI
Daniel	Siegel	1/24/2023	0.5	Team call
Daniel	Siegel	1/30/2023	2	Edit Ettner expert report
Daniel	Siegel	1/31/2023	0.6	Edit Ettner expert report
Daniel	Siegel	2/1/2023	3	Review Defendants' document production
Daniel	Siegel	2/6/2023	0.5	Review Defendants' document production
Daniel	Siegel	2/14/2023	2.5	Review Defendants' document production
Daniel	Siegel	2/16/2023	0.5	Call with opposing counsel re Rule 35 examination
Daniel	Siegel	2/17/2023	0.5	Review Defendants' Rule 35 motion and brief
Daniel	Siegel	2/18/2023	5	Draft response to Rule 35 motion
Daniel	Siegel	2/19/2023	3.7	Draft response to Rule 35 motion
Daniel	Siegel	2/20/2023	1.2	Revise and circulate Rule 35 response
Daniel	Siegel	2/21/2023	1	Revise Rule 35 response
Daniel	Siegel	2/22/2023	0.4	Call with opposing counsel re 30(b)(6) objections
Daniel	Siegel	2/22/2023	2.3	Revise Rule 35 response
Daniel	Siegel	2/23/2023	1	Revise Rule 35 response
Daniel	Siegel	2/24/2023	2.2	Finalize and file Rule 35 response
Daniel	Siegel	2/27/2023	2.8	Review Defendants' document production
Daniel	Siegel	2/28/2023	1	Team call
Daniel	Siegel	3/1/2023	1.5	Document review
Daniel	Siegel	3/2/2023	1.2	Document review
Daniel	Siegel	3/3/2023	1.2	Document review
Daniel	Siegel	3/27/2023	1	Doc review
Daniel	Siegel	3/28/2023	1	team meeting
Daniel	Siegel	4/12/2023	0.5	Team call re
Daniel	Siegel	5/3/2023	0.2	Edit email to opposing counsel re Rule 35 proposal
Daniel	Siegel	5/5/2023	1.5	Prepare for Harris depo
Daniel	Siegel	5/11/2023	3	Prepare for Harris depo
Daniel	Siegel	5/12/2023	2	Prepare for Harris depo
Daniel	Siegel	5/15/2023	1.5	Prepare for Harris deposition
Daniel	Siegel	5/16/2023	3	Take deposition of Brandeshawn Harris
Daniel	Siegel	5/25/2023	0.4	Meet and confer with opposing counsel re Rule 35 motion and fact discovery issues
Daniel	Siegel	6/26/2023	1.7	Revise mediation statement

Daniel	Siegel	6/27/2023	1	Team meeting
Daniel	Siegel	6/27/2023	1	Legal call with client
Daniel	Siegel	7/7/2023	2.5	Review Boyd, Penn, and Li expert reports
Daniel	Siegel	7/10/2023	1.3	Review Li report
Daniel	Siegel	7/10/2023	1.8	Review Boyd report
Daniel	Siegel	7/10/2023	2	Review Penn report
Daniel	Siegel	7/11/2023	0.5	Review Boyd report
Daniel	Siegel	7/11/2023	0.5	Review Penn report
Daniel	Siegel	7/11/2023	0.5	Review Li report
Daniel	Siegel	7/21/2023	3.5	Review Boyd report and prepare deposition outline
Daniel	Siegel	7/24/2023	1.5	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/25/2023	2.7	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/26/2023	1.2	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/27/2023	2.8	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/28/2023	3	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/29/2023	2.7	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/30/2023	2	Prepare Dr. Boyd deposition outline
Daniel	Siegel	7/31/2023	3.3	Prepare deposition outline
Daniel	Siegel	8/1/2023	0.5	Prepare for Boyd deposition
Daniel	Siegel	8/2/2023	0.6	Prepare for Boyd deposition
Daniel	Siegel	8/3/2023	1.5	Prepare for Boyd deposition
Daniel	Siegel	8/4/2023	5.5	Take deposition of Dr. Sara Boyd
Daniel	Siegel	8/21/2023	5.5	Draft Daubert brief to exclude testimony of Dr. Boyd
Daniel	Siegel	8/22/2023	2.3	Draft Boyd Daubert brief
Daniel	Siegel	8/23/2023	0.5	Edit Boyd Daubert brief
Daniel	Siegel	8/24/2023	0.5	Edit Boyd Daubert brief
Daniel	Siegel	8/29/2023	0.5	Team call
Daniel	Siegel	9/18/2023	2.5	Review Junker deposition for summary judgment brief
Daniel	Siegel	9/19/2023	1.5	Review Harris deposition transcript for summary judgment brief
Daniel	Siegel	9/19/2023	1.8	Review Boyd deposition transcript for summary judgment brief
Daniel	Siegel	9/27/2023	2.3	Edit argument section of MSJ brief
Daniel	Siegel	9/28/2023	1	Team call
Daniel	Siegel	9/28/2023	1.7	Edit facts section of MSJ brief
Daniel	Siegel	9/29/2023	0.6	Edit argument section of MSJ brief
Daniel	Siegel	9/29/2023	2	Edit facts section of MSJ brief
Daniel	Siegel	10/2/2023	2	Edit brief in support of summary judgment
Daniel	Siegel	10/3/2023	1.8	Edit brief in support of summary judgment
Daniel	Siegel	10/4/2023	2.7	Edit brief in support of summary judgment
Daniel	Siegel	10/5/2023	1.5	Edit brief in support of summary judgment
Daniel	Siegel	10/6/2023	2	Review Defendants' motion/brief for summary judgment and supporting materials
Daniel	Siegel	10/9/2023	3.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/10/2023	4.2	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/11/2023	3.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/12/2023	2.2	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/13/2023	0.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/14/2023	2	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/15/2023	2.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/16/2023	1.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/17/2023	2.4	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/18/2023	1.8	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/19/2023	1.3	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/20/2023	2.5	Review Defendants' response in opposition to plaintiff's motion for summary judgment
Daniel	Siegel	10/20/2023	2.8	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/21/2023	1	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/21/2023	3	Draft reply brief in support of motion for summary judgment
Daniel	Siegel	10/22/2023	0.5	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/22/2023	3.3	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/23/2023	0.8	Edit brief to exclude testimony of Dr. Penn
Daniel	Siegel	10/23/2023	1.3	Edit brief to exclude testimony of Dr. Li
Daniel	Siegel	10/23/2023	2.2	Draft response in opposition to defendants' motion for summary judgment

Daniel	Siegel	10/23/2023	3.5	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/24/2023	0.3	Edit brief to exclude testimony of Dr. Li
Daniel	Siegel	10/24/2023	1.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/24/2023	1.5	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/24/2023	2.3	Edit brief to exclude testimony of Dr. Penn
Daniel	Siegel	10/25/2023	1	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/25/2023	1	Edit brief to exclude testimony of Dr. Penn
Daniel	Siegel	10/25/2023	2.4	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/26/2023	1.4	Draft brief to exclude testimony of Dr. Boyd
Daniel	Siegel	10/26/2023	2.5	Draft response in opposition to defendants' motion for summary judgment
Daniel	Siegel	10/27/2023	0.7	Review Defendants' reply brief in support of motion for summary judgment
Daniel	Siegel	11/7/2023	1.5	Prepare for and participate in moot court for summary judgment hearing
Daniel	Siegel	11/8/2023	0.5	Discuss summary judgment hearing with J Maffetore
Daniel	Siegel	11/8/2023	2.5	Travel from Chapel Hill to Charlotte for summary judgment hearing
Daniel	Siegel	11/9/2023	1.5	Second chair hearing on motions for summary judgment
Daniel	Siegel	11/9/2023	2.5	Travel from Charlotte summary judgment hearing back to Chapel Hill
Daniel	Siegel	12/11/2023	0.5	Review response in opposition to motion to exclude Li
Daniel	Siegel	12/11/2023	0.7	Review response in opposition to motion to exclude Penn
Daniel	Siegel	12/11/2023	0.7	Review response in opposition to motion to exclude Boyd
Daniel	Siegel	12/12/2023	0.3	Review response brief to Boyd Daubert motion
Daniel	Siegel	12/12/2023	0.4	Review Li response to Daubert motion
Daniel	Siegel	12/12/2023	2.5	Outline reply brief in support of Daubert motions
Daniel	Siegel	12/13/2023	3.8	Draft reply brief in support of Daubert motions
Daniel	Siegel	12/14/2023	3	Draft reply brief in support of Daubert motions
Daniel	Siegel	12/15/2023	4	Draft reply brief in support of Daubert motions
Daniel	Siegel	12/16/2023	3.5	Draft reply brief in support of Daubert motions
Daniel	Siegel	12/17/2023	3.3	Draft reply brief in support of Daubert motions
Daniel	Siegel	12/18/2023	1	Finalize and file reply brief in support of Daubert motions
Daniel	Siegel	2/2/2024	1	Review order on summary judgment and discuss with team
Daniel	Siegel	2/21/2024	3.3	Draft brief in support of renewed motion for summary judgment.
Daniel	Siegel	2/22/2024	5.5	Draft brief in support of renewed motion for summary judgment.
Daniel	Siegel	2/23/2024	5	Draft brief in support of renewed motion for summary judgment.
Daniel	Siegel	2/24/2024	0.5	Draft brief in support of renewed motion for summary judgment.
Daniel	Siegel	2/26/2024	0.5	Revise brief in support of renewed MSJ
Daniel	Siegel	2/27/2024	0.3	Revise brief in support of renewed MSJ
Daniel	Siegel	2/29/2024	0.1	Review email from opposing counsel requesting extension of time
Daniel	Siegel	2/29/2024	0.6	Finalize and file renewed MSJ and supporting docs
Daniel	Siegel	3/1/2024	0.5	Draft and file response to defendant's motion for extension of time
Daniel	Siegel	3/22/2024	0.5	Team call re renewed MSJ briefing
Daniel	Siegel	3/22/2024	0.6	Review defendants' opposition to plaintiff's renewed MSJ and defendants' renewed MSJ brief
Daniel	Siegel	3/25/2024	1	Edit reply brief in support of renewed MSJ
Daniel	Siegel	3/29/2024	1.5	Edit opposition to defendants' renewed MSJ
Daniel	Siegel	3/30/2024	0.5	Edit opposition to defendants' renewed MSJ
Daniel	Siegel	3/31/2024	0.4	Edit opposition to defendants' renewed MSJ
Daniel	Siegel	4/16/2024	0.3	Review SJ order
Daniel	Siegel	5/21/2024	0.5	Edit response to motion to stay
Daniel	Siegel	5/22/2024	2	Edit response to motion to stay
Daniel	Siegel	7/18/2024	0.5	Review motion for stay pending appeal
Daniel	Siegel	7/18/2024	3.4	Draft response to stay motion
Daniel	Siegel	7/19/2024	4	Draft response to stay motion
Daniel	Siegel	7/20/2024	3.3	Draft response to stay motion
Daniel	Siegel	7/21/2024	3.3	Edit and cite-check response to stay motion
Daniel	Siegel	7/25/2024	0.2	Review order denying stay motion
Daniel	Siegel	7/26/2024	0.3	Review Defendants' proposal for compliance with the permanent injunction
Daniel	Siegel	7/27/2024	0.5	Draft objections to defendants' proposal for evaluating plaintiff
Daniel	Siegel	7/28/2024	0.3	Draft objections to defendants' proposal for evaluating plaintiff
Daniel	Siegel	7/29/2024	0.3	Draft objections to defendants' proposal for evaluating plaintiff
Daniel	Siegel	7/29/2024	1	Review defendants' opening brief
Daniel	Siegel	7/30/2024	0.5	Review defendants opening brief
Daniel	Siegel	7/31/2024	2.5	Outline appellee's brief

Daniel	Siegel	8/1/2024	3	Draft argument section of appellee's brief
Daniel	Siegel	8/2/2024	1.5	Draft argument section of appellee's brief
Daniel	Siegel	8/5/2024	2.5	Draft argument section of appellee's brief
Daniel	Siegel	8/6/2024	4	Draft argument section of appellee's brief
Daniel	Siegel	8/7/2024	3.6	Draft argument section of appellee's brief
Daniel	Siegel	8/8/2024	3.3	Draft argument section of appellee's brief
Daniel	Siegel	8/9/2024	4	Draft argument section of appellee's brief
Daniel	Siegel	8/10/2024	0.5	Draft argument section of appellee's brief
Daniel	Siegel	8/12/2024	2	Draft argument section of appellee's brief
Daniel	Siegel	8/14/2024	1.5	Edit facts section of appellee's brief
Daniel	Siegel	8/19/2024	2.2	Edit appellee's brief
Daniel	Siegel	8/20/2024	1.4	Edit appellee's brief
Daniel	Siegel	8/21/2024	0.4	cite check appellee's brief
Daniel	Siegel	8/22/2024	2	cite check appellee's brief
Daniel	Siegel	8/26/2024	1.5	Final review of appellee's brief
Daniel	Siegel	11/15/2024	1	Edit supplemental brief
Daniel	Siegel	11/19/2024	0.8	Edit response to Defs notice of compliance
Daniel	Siegel	7/10/2025	1.3	Edit brief in support of motion for fees
Daniel	Siegel	7/10/2025	1	Draft declaration in support of motion for fees
Daniel	Siegel	7/17/2025	0.5	Edit brief in support of motion for fees
Daniel	Siegel	7/18/2025	0.3	Edit brief in support of motion for fees

TOTAL 346.6

ATTACHMENT 3 - Timesheet for Michele Delgado

First Name	Last Name	Date	Hours	Notes
Michele	Delgado	4/8/2022	2.2	Drafted Declaration of Jaclyn
Michele	Delgado	4/15/2022	3	Legal research on PRLA physical injury requirement as it relates to supplemental claims
Michele	Delgado	4/18/2022	2	Legal research on PRLA physical injury requirement as it relates to supplemental claims
Michele	Delgado	4/19/2022	2	Legal research on PRLA physical injury requirement as it relates to supplemental claims
Michele	Delgado	4/21/2022	0.3	Adopted edits for the declaration and did a final review
Michele	Delgado	6/29/2022	6.7	Draft my section of the Response to the MTD brief
Michele	Delgado	6/30/2022	7.5	Continued to draft and conduct research for my portion of the response brief for the MTD
Michele	Delgado	7/1/2022	7.4	Draft response brief for the MTD
Michele	Delgado	7/5/2022	3	Edit brief responding to MTD
Michele	Delgado	7/11/2022	1.5	Final review and edits to response to MTD
Michele	Delgado	7/20/2022	1	Drafted Motion for Extension
Michele	Delgado	7/21/2022	1	Edit and file Motion for Extension and Proposed Order
Michele	Delgado	10/21/2022	1	Draft initial disclosures
Michele	Delgado	10/24/2022	1	Research for initial disclosures
Michele	Delgado	10/25/2022	1	Finalize initial disclosure
Michele	Delgado	10/27/2022	1	Edit initial disclosures
Michele	Delgado	1/5/2023	3	Drafted joint motion to extend for dispositive motions
Michele	Delgado	2/2/2023	3	Doc Review
Michele	Delgado	2/3/2023	3	Reviewed Discovery
Michele	Delgado	2/6/2023	3	Doc review
Michele	Delgado	2/7/2023	3	Doc review
Michele	Delgado	2/9/2023	2	Doc review.
Michele	Delgado	2/10/2023	2.5	Doc review.
Michele	Delgado	2/13/2023	3	Doc review
Michele	Delgado	2/14/2023	3	Doc Review
Michele	Delgado	2/15/2023	2	Doc review.
Michele	Delgado	2/16/2023	5.8	Doc review
Michele	Delgado	2/17/2023	5.8	Doc Review
Michele	Delgado	2/23/2023	6.1	Doc Review
Michele	Delgado	2/27/2023	6	Doc Review
Michele	Delgado	2/28/2023	5	Doc Review
Michele	Delgado	3/1/2023	4.7	Doc Review
Michele	Delgado	3/2/2023	3.4	Doc Review
Michele	Delgado	3/3/2023	7.5	Doc Review
Michele	Delgado	3/6/2023	4.5	Doc Review
Michele	Delgado	3/7/2023	4.8	Doc Review
Michele	Delgado	3/8/2023	6.4	30(B)(6) Outline drafting
Michele	Delgado	3/9/2023	5.7	Doc review for Outline for 30(b)(6)
Michele	Delgado	5/10/2023	3	Drafting catlett depo outline
Michele	Delgado	5/11/2023	2.5	draft catlett depo outline
Michele	Delgado	5/12/2023	0.1	Draft notice of deposition
Michele	Delgado	5/12/2023	3.5	draft catlett depo outline
Michele	Delgado	5/15/2023	3	Review of additional discovery documents in preparation of catlett depo
Michele	Delgado	5/17/2023	1	final review and edits of catlett depo outline
Michele	Delgado	5/18/2023	4	Deposition of Terri Catlett
Michele	Delgado	5/18/2023	4	Catlett Deposition
Michele	Delgado	5/19/2023	3.4	Reviewed Kanautica's transcript for confidential designations
Michele	Delgado	6/22/2023	0.6	Reviewed docs and outlined questions for Bowman deposition
Michele	Delgado	6/29/2023	0.7	Catlett transcript review and designations
Michele	Delgado	6/29/2023	3.5	Bowman deposition
Michele	Delgado	9/26/2023	1.3	Drafted Motion for SJ
Michele	Delgado	9/26/2023	1.6	Reviewed Catlett's Transcript for quotes for SJ outline
Michele	Delgado	9/27/2023	1.9	Reviewed Bowman's Transcript for quotes for SJ outline
Michele	Delgado	9/28/2023	0.2	Edit draft motion for partial SJ
Michele	Delgado	9/28/2023	0.5	Reviewed legal portion of SJ brief
Michele	Delgado	9/28/2023	0.9	Marked designations from Catlett and Bowman transcripts

Michele	Delgado	9/28/2023	1.5	Add to and edited facts section of SJ brief
Michele	Delgado	10/4/2023	0.1	Edit SJ motion
Michele	Delgado	10/5/2023	0.9	Edit SJ brief
Michele	Delgado	10/25/2023	2.2	Cite checking reply to MSJ brief
Michele	Delgado	12/18/2023	1.2	Cite checking reply brief
Michele	Delgado	1/4/2024	1.8	Drafting stipulation of facts
Michele	Delgado	1/9/2024	4.1	Drafting Stipulations of Fact
Michele	Delgado	1/16/2024	0.2	Edit Stipulation of Facts
Michele	Delgado	2/12/2024	1	Research and draft writ
Michele	Delgado	3/14/2024	0.8	Drafted a motion to continue trial
Michele	Delgado	7/18/2024	0.3	Research moot question
Michele	Delgado	8/22/2024	3.6	Cite checked 4th circuit brief
Michele	Delgado	9/16/2024	3.1	Researched prevailing party status
Michele	Delgado	9/17/2024	5	Researched prevailing party status
Michele	Delgado	10/30/2024	0.5	Draft Joint MTC
Michele	Delgado	11/18/2024	0.6	Cite checked supplemental brief
Michele	Delgado	11/20/2024	0.9	Cite checked response to notice of compliance
Michele	Delgado	12/2/2024	1.5	Draft motion to extend time for attorneys fees

199.8

ATTACHMENT 4 -- Expenses

Fee Petition (Non-Taxable Items)		Item	Date	Cost
Category				
Attorney travel expenses				
Transportation, Mileage, & Parking	Jaclyn Maffetore, Budget Rent-A-Car - rental car for client visit at Anson CI (124 miles away 1 way)	4/30/2022	\$123.49	
	Jaclyn Maffetore, GAS - Sheetz: gas to top up rental car for trip to Anson CI for client visit	4/30/2022	\$19.51	
	Jaclyn Maffetore, GAS - Sheetz, Incgas to top up rental car for return following trip to Charlotte Airport and Anson CI	5/31/2022	\$16.83	
	Jaclyn Maffetore, GAS - Circle K: gas for rental car for trip to Charlotte Airport and Anson CI	5/31/2022	\$32.98	
	Jaclyn Maffetore, Enterprise Rent A Car - rental car for trip to pick up expert at Charlotte Airport and drive to client evaluation at Anson CI	5/31/2022	\$86.83	
	Jaclyn Maffetore, Enterprise Rent-A-Car - rental receipt for trip to Anson CI to have client sign documents	6/30/2022	\$121.88	
	Jaclyn Maffetore, GAS - Sheetz: gas to top up rental car for trip to Anson CI to have client sign documents	6/30/2022	\$40.14	
	Jaclyn Maffetore, Hertz Rent A Car - rental car to drive to CLT for hearing	8/31/2022	\$97.56	
	Jaclyn Maffetore, GAS - Sheetz #647: gas to fill up rental car to CLT prior to return	8/31/2022	\$31.22	
	Michele Delgado, MILEAGE - 188.2 mi @ \$0.625 / mi: MTD and PI Hearing	8/31/2022	\$117.63	
	Jaclyn Maffetore, PARKING - Epicentre - Preferred Parking: overnight deck parking in downtown CLT for hearing	8/31/2022	\$30.00	
	Michele Delgado, MILEAGE - 186.29 mi @ \$0.625 / mi; MTD and PI Hearing	8/31/2022	\$116.43	
	Michele Delgado, Parking - MTD and PI Hearing	8/31/2022	\$13.00	
	Dan Siegel, MILEAGE - 247.33 mi @ \$0.625 / mi: Travel to and from prison for depo prep	1/31/2023	\$154.58	
	Dan Siegel, MILEAGE - 233.26 mi @ \$0.625 / mi: Trip to and from deposition	1/31/2023	\$152.79	
	M.Delgado CC, Uber - Uber to Dan's for Carpooling to Prison for Depo	1/31/2023	\$58.62	
	M.Delgado CC, Uber - Uber back from Dan's for KZB Depo	1/31/2023	\$63.23	
	M.Delgado CC, Uber - Uber Tip Charged Separately (KZB Depo)	1/31/2023	\$15.80	
	D.Siegel CC, PARKING - Cityparking Inc.: Parking in Richmond	1/31/2023	\$15.00	
	J. Maffetore CC, PARKING - State Parking Div Visito: parking for Peiper deposition	5/31/2023	\$12.00	
	J. Maffetore CC, PARKING - State Parking Div Visito: parking for Junker deposition	5/31/2023	\$16.00	
	D. Siegel CC, PARKING - Daniel S. McLaurin Parking Municipalparking for Junker deposition	5/31/2023	\$14.00	
	M. Delgado CC, PARKING - State Parking Div Visito: Parking Deck	5/31/2023	\$8.00	
	M. Delgado CC, PARKING - State Parking Div Visito: Parking Deck	5/31/2023	\$8.00	
	J. Maffetore CC, PARKING - State Parking Div Visito: parking for Catlett deposition	5/31/2023	\$12.00	
	M. Delgado CC, PARKING - State Parking Div Visito: Parking Deck	5/31/2023	\$12.00	
	M. Delgado CC, Parking - Parking Deck Expense for Deposition	6/30/2023	\$8.00	
	Maffetore CC, PARKING - State Parking Div VisitorParking for Michele Delgado for mediation m	7/31/2023	\$16.00	
	Maffetore CC, PARKING - Hilton Palmer Houser: Parking for mediation	7/31/2023	\$16.00	
	Siegel CC, PARKING - The Carpark Municip: Parking for mediation	7/31/2023	\$14.00	
	Maffetore CC, PARKING - parking for deposition of Dr. Boyd at DOJ	8/31/2023	\$10.00	
	Siegel CC, PARKING - Parking for Dr. Boyd depo	8/31/2023	\$12.00	
	Delgado CC, PARKING - State Parking Div Visito: Parking Deck - Dr. Penn's Deposition	8/31/2023	\$18.00	
	Siegel CC, PARKING - parking for Penn depo	8/31/2023	\$16.00	
	Maffetore CC, PARKING - Parking for deposition of Dr. Penn at DOJ	8/31/2023	\$18.00	
	Maffetore CC, PARKING - State Parking Div Visitor: Parking for deposition of Dr. Li at DOJ	8/31/2023	\$12.00	
	Dan Siegel, MILEAGE - 289.31 mi @ \$0.655 / mi: Travel to and from Charlotte for summary judgment hearing	11/30/2023	\$150.00	
	M. Delgado CC, Parking - Parking Lot Expense for SJ Hearing	11/30/2023	\$17.00	
	D. Siegel CC, Parking - Overnight parking	11/30/2023	\$42.00	
	Jaclyn Maffetore, Mileage - mileage to/from hearing in wdnc - permission from KG to drive own car alone due to illness and logistical difficulty getting rental	11/30/2023	\$213.15	
	Dan Siegel, MILEAGE - 288.36 mi @ \$0.67 / mi: Travel to and from Charlotte for SJ hearing	2/29/2024	\$150.00	
	M.Delgado CC, PARKING - Parking Lot - Evidentiary Hearing	2/29/2024	\$17.00	
	L.Robbins CC, PARKING - Pps - Surface Lot":Parking for KZB Hearing	2/29/2024	\$17.00	
	Jaclyn Maffetore, MILEAGE - 313.57 mi @ \$0.67 / mi: max \$150 in mileage for using own car for evidentiary hearing at WDNC, resubmitted due to not attaching map	2/29/2024	\$150.00	
	J.Maffetore CC, Parking - Parking for KZB evidentiary hearing	2/29/2024	\$17.00	
	J. Maffetore CC, PARKING - Doa State Parking Div: parking for mediation	3/31/2025	\$10.00	
	J. Maffetore CC, PARKING - Doa State Parking Div:client parking for mediation	3/31/2025	\$10.00	
	J. Maffetore CC, PARKING - Doa State Parking Div: parking for mediation	3/31/2025	\$4.00	
	D. Siegel CC, PARKING - Doa State Parking Div:	3/31/2025	\$10.00	
	M. Delgado CC, PARKING - Parking Deck - KZB Mediation	3/31/2025	\$10.00	
	M. Delgado CC, PARKING - Parking - Status Conference	4/30/2025	\$14.00	
	D. Siegel CC, PARKING - Pps - Surface Lot: Parking for status conference	4/30/2025	\$15.00	
	Michele Delgado, MILEAGE - 360.07 mi @ \$0.70 / mi: Mileage - Status Conference	4/30/2025	\$150.00	
	Jaclyn Maffetore, MILEAGE - 313.75 mi @ \$0.70 / mi: travel to/from status fonference at WDNC courthouse	5/31/2025	\$150.00	
Accommodations & Hotels	Jaclyn Maffetore, HOTEL - Aloft: hotel for morning hearing in Charlotte	8/31/2022	\$165.55	
	J. Maffetore CC, HOTEL - Residence Inn for summary judgment hearing at wdnc	11/30/2023	\$273.14	
	D. Siegel CC, Hotel - Hotel	11/30/2023	\$295.04	
	J. Maffetore CC, HOTEL - Residence Inn overnight parking	11/30/2023	\$29.00	
	L.Robbins CC, HOTEL - Doubletree Hotels: Hotel stay for Michele Delgado for hearing	2/29/2024	\$214.56	
	L.Robbins CC, HOTEL - Doubletree Hotels: Hotel stay for Jaclyn Maffetore for hearing	2/29/2024	\$200.67	
	L.Robbins CC, HOTEL - Doubletree Hotels: Hotel stay for Dan Siegel for hearing	2/29/2024	\$214.56	
	L.Robbins CC, USPS - Mailing of SJ to KZB	5/31/2024	\$9.85	
Postage for client communications	L.Robbins CC, USPS - Overnight mailing docs back to KZB	5/31/2024	\$30.45	
	J.Maffetore CC, USPS - mailing appeal document overnight to client due to emergency deadline	5/29/2024	\$30.45	
TOTAL				\$4,138.94